



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Division of Health Professions Licensure
239 Causeway Street, Suite 200, 2nd Floor, Boston, MA 02114

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD
SECRETARY

JOHN AUERBACH
COMMISSIONER

BOARD OF REGISTRATION IN DENTISTRY
(617) 973-0971
TTY (617) 973-0895

CLARIFICATION: LIMITED LICENSEE AUTHORITY TO PRESCRIBE

February, 2008

1. Limited licensees are required to practice under the direction of a licensed dentist in a specific hospital, school, or clinic setting for a limited period of time (MGL c. 112, s.45A).
2. Limited licensees may not practice in a private practice and may not obtain a controlled substance registration.
3. However, Massachusetts controlled substance regulations, (105 CMR 700.004 (B) (5), do permit limited licensees (as dental interns) to dispense controlled substances under the controlled substance registration of the hospital or other registered health facility by which he/she is employed in lieu of being registered himself/herself provided that:
 - The limited licensee is acting only within the scope of his/her employment in the hospital or other registered health facility; and
 - The hospital or other registered health facility authorizes the person to dispense controlled substances under the registration number of the hospital or other registered health facility and designates a specific internal code to consist of a numeric suffix to the health facility registration number preceded by a hyphen for each such person so authorized; and
 - The hospital or other registered health facility maintains a current list of internal codes and makes such codes available to other registrants, the Commissioner, and authorized law enforcement agencies.
4. MGL c. 94C, the Controlled Substances Act, specifically defines the following key terms:
 - “Dispense”, to deliver a controlled substance to an ultimate user or research subject or to the agent of an ultimate user or research subject by a practitioner or pursuant to the order of a practitioner, including the prescribing and administering

of a controlled substance and the packaging, labeling, or compounding necessary for such delivery.

- “Practitioner” is defined as (a) a physician, dentist, veterinarian, podiatrist, scientific investigator, or optometrist who dispenses controlled substances in the course of his/her professional practice and (b) “a pharmacy, hospital or other institution registered to distribute or dispense a controlled substance in course of professional practice”.

5. Therefore, limited licensees may prescribe and administer controlled substances under the registration of the hospital, clinic, or school where they are employed.